

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the
United States, *et al.*,

Defendants.

No. 17-cv-00094 RAJ

**SUPPLEMENTAL DECLARATION OF
SAMEER AHMED IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SANCTIONS**

I, Sameer Ahmed, declare as follows:

1. I am an attorney at law, admitted in the State of California and currently employed by the ACLU Foundation of Southern California as a Staff Attorney. I am counsel for Plaintiffs in this case. I have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. My background and experience as an attorney was set forth in the Declaration of Sameer Ahmed in Support of Plaintiffs' Motion for Sanctions (Dkt. 143).

3. I recorded my time contemporaneously for this matter using the timekeeping program Toggl.

4. Attached as **Exhibit A** to this declaration is a true and correct copy of my timesheet for the work performed preparing and filing Plaintiffs' Motion for Sanctions and Reply Brief in Support of the Motion for Sanctions, as well as related telephonic conversations.

5. As supported by the Declaration of Carol Sobel, the hourly rate of the work performed is \$676.85 for 2018 for Ms. Pasquarella and \$600.38 for 2018 for me, based on our year of graduation and the market rates for Seattle, Washington. *See* Declaration of Carol Sobel in Support of Plaintiffs' Motion for Sanctions (Dkt. 138).

6. Below is a chart that details the attorneys' fees that we are seeking for preparing Plaintiffs' Motion for Sanctions and Reply Brief In Support of the Motion for Sanctions. The total value of my work is \$ 4,953.14.

	Sameer Ahmed
Plaintiffs' Motion for Sanctions and Reply Brief and related telephonic conversations	8.25 hours x \$600.38 rate
	\$4,953.14

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 10th day of March, 2019, at Los Angeles, California.

/s/ Sameer Ahmed
Sameer Ahmed

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I caused service of the foregoing document via the CM/ECF system, which will automatically send notice of such filing to all counsel of record.

DATED this 13th day of March, 2019, at Seattle, Washington.

s/ Cristina Sepe
Cristina Sepe, WSBA No. 53609
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EXHIBIT A



Detailed report

2018-01-01 - 2018-12-31

Total 08 h 15 min

Date	Description	Duration	User
03-01	meet and confer call regarding class list and sanctions motion	1:00:00	Sahmed
	Wagafe - Motion for Sanctions	09:00-10:00	
03-05	meet and confer call regarding sanctions motion	0:30:00	Sahmed
	Wagafe - Motion for Sanctions	13:30-14:00	
03-07	meet and confer call with defendants	1:00:00	Sahmed
	Wagafe - Motion for Sanctions	13:30-14:30	
03-16	revise motion for overlength brief for sanctions motion	0:31:00	Sahmed
	Wagafe - Motion for Sanctions	14:05-14:36	
03-25	revise motion for sanctions	1:10:00	Sahmed
	Wagafe - Motion for Sanctions	12:05-13:15	
03-27	call to discuss motion for sanctions	1:00:00	Sahmed
	Wagafe - Motion for Sanctions	11:30-12:30	
04-06	call to discuss motion for sanctions	0:30:00	Sahmed
	Wagafe - Motion for Sanctions	11:30-12:00	
04-10	call to discuss motion for sanctions reply brief	0:30:00	Sahmed
	Wagafe - Motion for Sanctions	10:30-11:00	
04-12	Telephonic hearing re ex parte in camera docs and prep for hearing	1:00:00	Sahmed
	Wagafe - Motion for Sanctions	10:00-11:00	
04-12	revise reply brief in support of motion for sanctions	1:04:00	Sahmed
	Wagafe - Motion for Sanctions	16:15-17:19	

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